

Brief Overview of the ADOT Statewide Stormwater Permit

effective September 19, 2008

A great deal of the permit conditions are currently being done throughout ADOT, the main issue will be coordinating those groups/Districts in order to get the necessary information for the required annual report to ADEQ. The DEC's will be an integral part of the process.

*Even though this permit is statewide, it does not cover any activities on Indian Lands.

****Text in blue is for informational purposes.**

Section 1.0 Authorization

This section outlines what discharges are allowed and the limitations of coverage for this permit. Allowable non-stormwater discharges as identified in Table 1.3 are allowed to be discharge off of ADOT property as long as all of the conditions of that discharge are met (i.e., not contaminated). There is however a prohibition on non-stormwater discharges that have the potential to reach either a unique or impaired water.

Section 2.0 Legal Authority

This section lays out the legal authority that ADOT has to comply and enforce this permit.

Section 3.0 Stormwater Discharges from ADOT's Storm Sewer System

ADOT's storm sewer system or MS4 is defined as all of our roadways (including r/w) and associated structures.

This section mandates that we must update our 2005 Statewide Stormwater Management Plan (SSWMP) within 12 months of the permit issuance and lays out what needs to be included in the updated SSWMP. The SSWMP will basically dictate how the stormwater program is run and everything contained in the SSWMP shall be completed in the term of the permit.

*The term BMP used in this section should be understood to mean program elements and should not be confused with the common usage of BMP in the construction and industrial sections.

Education is a large portion of this permit (i.e., illicit discharge, non-stormwater discharges, construction inspections, post-construction [permanent] BMPs for design, good housekeeping BMPs [pesticide, herbicide, fertilizer use; waste disposal], etc.). Classes already exist that will satisfy some of the requirements with minor tweaking. Other classes have been developed and shelved until the final permit is issued and will be updated and then implemented. For other areas that are not covered in any of the other existing classes, new classes will need to be created. It is my hope that we can just incorporate the necessary information into exiting classes. The first round of employee training will need to be completed within 12 months of the effective date. As a portion of the education requirement, a stormwater library will be established more than likely on the Water Quality website.

ADOT will now be required to have a public education/outreach and a public involvement/participation element to our stormwater program. ***A bit of this is currently being done through attendance at regional specific meetings (i.e., NASPA, PAG SWMWG, and STORM).** The important thing will be to keep track of what is being done and when (see

specifics in permit). ADOT will need to implement a stormwater specific public reporting system (or adapt existing) to track and investigate reports of spills, discharges, etc.

ADOT will establish internal and external coordination with regards to stormwater. Internally, we will continue to use the SWATs (Stormwater Advisory Teams, see list). Externally, we have already begun with our participation in NASPA, PAG SWMWG, STORM, and AGC. This can be expanded to include agreements with MS4s with regards to conveyances or stormwater discharges (details to be worked out at a later date).

ADOT will be required to expand its existing illicit discharge, detection and elimination (IDDE) measures. For external parties enforcement of encroachment permits will be one of the ways to accomplish this. Policies and procedure will need to be created.

In order to figure out if we have illicit discharges ADOT will need to inventory our system. Currently we know that we have 71 major outfalls (larger than 36 inches) in the Phase I and II areas. We will need to figure out where all of the outfalls in the Phase II areas and priority outfalls statewide are located (to be complete by end of permit). In addition, within the permit term we need to map our entire storm sewer system (including pipes, streets, structures, outfalls, drywells, detention/retention basins, etc.). We now have a timeframe in which we are to respond to reports of illicit discharges (15 days) and action must be taken to eliminate the source within 90 days. All of this will need to be reported in the Annual Report to ADEQ. Within the first two years we will have to inspect and record the condition of the system.

Develop procedures (included in the Post-construction Stormwater Control BMP Manual) to determine if post-construction (permanent) BMPs are appropriate for any project greater than an acre that occurs in the MS4 compliance areas (see permit fact sheet for list). Post-construction BMPs will be installed for projects that discharge to unique or impaired waters. To account for the long planning and design process, ADEQ included a grandfather clause that allows any project at the time of permit issuance that is beyond Phase I (15%) to be effectively cleared of this condition.

ADOT will have to identify and prioritize maintenance schedules for the storm sewer system. ADOT will have to develop a system (within 12 months) to identify, track, and prioritize stabilization and repairs to road segments that are steeper than 3:1 **and** actively discharging **and** leaving ADOT r/w or discharging to WUS.

Update within 12 months of permit issuance:

Erosion and Pollution Control Manual

Stormwater Monitoring Guidance Manual for MS4 Activities

Post-construction Stormwater Control BMP Manual

Maintenance and Facilities BMP Manual

Section 4.0 Stormwater Discharges from ADOT Maintenance Yards

This section describes the measures that are to be implemented at maintenance yards statewide. BMPs (spelled out in this section) are required for maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt and sand storage locations and snow disposal areas (4.1.4). In addition, ADOT shall make sure that spills do not

leave the maintenance yards. All new catch basins at maintenance yards will have markers or stencils. By the end of the permit all existing catch basins will have markers or stencils.

SWPPPs will be developed and implemented for: Avondale Maintenance Yard, Bisbee Storage Yard, Broadway Maintenance Yard, Douglas Maintenance Yard, Durango Maintenance Yard, Phoenix Equipment Services, Flagstaff Maintenance Yard, Grand Avenue Landscape Maintenance Yard, Little Antelope Yard, Mesa Country Club Maintenance Yard, Mesa Recker Road Maintenance Yard, Nogales Maintenance Yard, North Phoenix Maintenance Yard, Prescott Valley Maintenance Yard, Statewide Striping Facility, Superior Maintenance Yard, Superior Storage and Fuel Yard, Tucson Grant Road Maintenance Yard, and Yuma Maintenance Yard. Since most if not all have been developed, then the SWPPPs must be updated within 180 days of the effective date of the permit (4.2.1.5).

New maintenance yards in MS4s areas will require the development and implementation of a SWPPP prior to discharge.

Treatment of stormwater from a maintenance facility is needed if necessary to meet any applicable water quality standards. (However since monitoring is not required at 15 of the yards, it will be impossible to know if treatment is really necessary.)

Conduct a Comprehensive Maintenance Facility inspection at the listed yards (or any others that are required to have a SWPPP) at least yearly. SWPPPs and BMPs need to be modified within 30 calendar days of the inspection (maintenance of BMPs is within 5 days). If sediment leaves the yard, ADOT must remove the off-site accumulations within seven days (may be precluded by legal or physical access, etc). Inspection records will be kept **5 years** from the **expiration** of this permit.

Grant Road Maintenance Yard-if erosion, excessive sedimentation or exposed waste is noted, corrective measures are to be implemented.

Wickenburg Maintenance Yard-millings shall not discharge offsite. ADOT shall conduct an investigation and remediation if necessary of the presence, depth, and horizontal extent of any contaminated soils around and within the docking facility area, the oil storage shed, and the abandoned vehicle wash area, as all these areas are known to have received past spills and/or discharges (within 12 months); include results of these investigations and any corrective actions in the first Annual Report.

For all maintenance yards that do not require a SWPPP, a copy of the Maintenance and Facilities BMP Manual shall be kept on-site or at the nearest District Engineer's office.

Update within 12 months of permit issuance:
Maintenance and Facilities BMP Manual-Program 9

Section 5.0 Stormwater Discharges Associated with Construction Activity

This section describes the measures that are to be implemented for construction activities owned, operated, or contracted by ADOT. Permit conditions are extremely similar to those contained in the CGP. Construction includes all areas used **exclusively** (defined as those activities that are

intended to serve ADOT only) for ADOT construction projects including: staging areas, borrow areas, storage areas and yards, access roads, and any mobile operations (batch plants).

No permit waivers allowed for projects between 1 and 5 acres.

Monitoring is required for any support activity (asphalt and concrete batch plants; borrow areas, staging and storage areas) within ¼ mile of a unique or impaired water (to get around this, make sure that these activities are not within ¼ mile of unique or impaired water). Asphaltic wastes must be removed from the site and disposed of properly.

Major differences between the ADOT permit (construction section) site map and that for the CGP are: need to include approximate slopes anticipated after major grading activities and identification of locations of asphalt and concrete batch plants (where applicable).

Non-stormwater discharges not specified in Section 1.3 are not allowed.

At least once every month, ADOT shall inspect asphalt facilities used exclusively by ADOT and maintain inspection reports for material storage and handling areas, etc. At least once every month, ADOT shall, while the plant is operating, inspect concrete batch plants used exclusively for ADOT projects, and maintain inspection reports.

Inspections shall be done by a trained and certified Erosion Control Coordinator (ECC) (provided by ADOT or contractors). Inspection records are to be kept for at least 5 years from the expiration of this permit (up from 3 years)

ADOT contractors will comply with the CGP for regulated construction projects, including the contractor's requirement to file a NOI and NOT. ADOT may also impose project requirements in addition to those specified in the CGP (this will be through our specifications).

When contractors complete their work at a site and interim stabilization is in place, they may file a NOT to terminate their responsibility for site activities (this will still occur the way it does today with the consent of the RE/District).

Where it states that removal of temporary BMPs is necessary prior to the filing of the NOT, this provision does not require removal of BMPs such as straw waddles that are permanently incorporated into final stabilization provided they are specified as part of the site's final stabilization plan and are properly maintained.

By July 10th and January 10th of each year, ADOT shall provide ADEQ with an electronic list of all construction projects, including the name of the project and its associated AZCON number(s), that have achieved final stabilization and that ADOT considers complete. ADOT shall submit this list or shall provide ADEQ with a website address which will be continually updated with the required information.

In the Annual Report, ADOT will list and describe all violations and their resolution, including any enforcement actions taken against its contractors.

Section 6.0 Stormwater Discharges from ADOT Facilities Associated with Industrial Activities

Industrial facilities covered are Grand Canyon National Park Airport, Durango Sign Factory, Phoenix Print Shop, and material sources which are owned, operated, permitted, or leased by ADOT.

For new facilities, ADEQ has to be notified 30 day in advance prior to discharge. Requests for new material sources will be at least 60 days prior to discharge.

SWPPPs for the material sources will be maintained at the nearest District office. [This needs to be coordinated with the Materials Group.](#)

For those facilities required to have a SWPPP, a comprehensive inspection needs to be conducted annually (along with report); however visual inspections should occur quarterly. SWPPP needs to be revised within 30 calendar days if deficiencies are noted.

ADOT shall provide velocity dissipation devices at locations where discharges leave ADOT's property or right-of-way and along the length of any outfall channel on ADOT's property.

Conditions for the Grand Canyon National Airport apply to ADOT and the airport tenants (Section 6.6). Can only discharge stormwater from those portions of the Grand Canyon National Park Airport that are involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication), equipment cleaning operations, de-icing operations, and from runways and parking lots. The SWPPP shall be revised within 90 days. Quarterly inspections will be conducted and monthly inspections will be conducted when deicing occurs. ADOT shall complete an inspection report for each annual comprehensive site compliance evaluation, and shall include the inspection report in the Annual Report.

The Durango Sign Shop SWPPP shall be revised within 90 days (Section 6.7). ADOT shall complete an inspection report for each annual comprehensive site compliance evaluation, and shall include the inspection report in the Annual Report.

The conditions in Section 6.8 apply where ADOT has exclusive use of a material source site, or whenever ADOT is actively operating at a joint use site. For material source joint-use sites, ADOT shall sign on to the operator's SWPPP, or develop and implement their own SWPPP for areas where ADOT has operational control ([this is being worked out with BLM and USFS](#)). Mining activities includes borrow pits, cinder pits, sand and gravel operations, stone quarries, and activities composed of exploring for stone, sand, gravel and cinder; developing material source pits; and excavating and storing mined materials; processing material sources, which includes but is not limited to, plant and truck screening, making pre-mix material, bulk material handling, and storage. Group I sites (stockpiles) will have BMPs implemented. SWPPPs will need to be prepared for materials sites that are within ¼ mile of unique, impaired, and not attaining waters. [Currently, ADOT does not have any material sources that are within ¼ mile of listed waters. However, some land managing agencies may still require SWPPPs; check with the Materials Group on requirements for a specific site.](#) At joint use sites, ADOT is only responsible for their portion of the site ([this may differ from what the land managing agencies require in our leases](#)). ADOT may also decide to create "Erosion and Pollution Control Plan" for all of those

sites that are further than ¼ mile from listed waters to cover BMPs that should be in place. Stabilization shall be within 14 days. Quarterly inspections will occur at Group A sites; annual inspections will occur at Group B and C sites. For exclusive sites an annual comprehensive inspection must occur (if within ¼ mile).

The Print Shop has a no exposure certification (Section 6.9) and annually ADOT will confirm that this designation still is applicable.

Section 7.0 Protection of Water Quality and Compliance with Arizona Water Quality Standards

ADOT shall protect water quality by reducing, to the maximum extent practicable, any discharge that may cause or contribute to an exceedance of any water quality standard of the State of Arizona, applicable to receiving waters of the MS4 (Section 7.1.1).

If monitoring data collected under this permit show a recurring (more than once) condition at an outfall, ADOT shall investigate and identify potential source(s) of the pollutant(s). ADOT shall evaluate the effectiveness of existing BMPs on the pollutant(s) of concern and necessary pollutant reductions to achieve water quality standards. ADOT shall identify additional BMPs or actions necessary to improve the quality of discharges from ADOT's MS4.

If despite full implementation of the SSWMP and other requirements of this permit, ADOT finds that a discharge contains a pollutant above a water quality standard (WQS), ADOT shall report this information in the Annual Report.

If a discharge of pollutants above a WQS persists and ADOT has not acted to reduce the discharge to the maximum extent practicable, this permit may be reopened and modified to require additional actions to control the discharge of pollutants.

ADOT shall protect water quality by ensuring that no discharge from industrial or construction activities causes or contributes to an exceedance of any applicable Arizona surface water quality standard (Section 7.2.1). If ADOT finds that a discharge is causing or contributing to an exceedance, ADOT shall: report any exceedance in the Annual Report and take all necessary actions to ensure that future discharges do not cause or contribute to an exceedance of any.

The section on TMDLs applies to ADOT's MS4 system statewide (Section 7.3). If a TMDL is established during the permit term for any receiving water into which ADOT discharges, ADOT shall meet any applicable requirements of a final TMDL and the associated implementation plan, including any assigned wasteload allocation or load allocation. ADOT shall include stormwater monitoring results and the assessment of the effectiveness of BMPs in meeting wasteload allocations or load allocations associated with the TMDL in the Annual Report.

Section 8.0 Monitoring Requirements

Monitoring results for industrial and construction facilities will be reported on a Discharge Monitoring Report form (DMR) and included as an attachment to the Annual Report. All records shall be kept for 5 years after the expiration of this permit.

Construction sites, asphalt batch plants, and asphalt plants that are within ¼ mile of unique or impaired waters will require monitoring. Construction sites are to be sampled whenever stormwater is discharging from the site. Analytical monitoring (turbidity and other parameters identified for the water) is required. ADOT can submit an alternative monitoring plan for approval 90 days prior to commencement of construction activities. Visual monitoring is required and shall consist of weekly inspections of the BMPs.

Concrete and asphalt plants shall monitor a discharge from a storm event has at least 0.1 inch of precipitation. Parameters to be monitored for are listed in 8.4.4 (concrete) and 8.4.5 (asphalt).

Stormwater samples are to be taken from any storm that produces at least 0.1 inch of precipitation providing the interval from the preceding storm is at least 72 hours. The 72 hours is waived if the preceding storm did not yield at least 0.1 inch of discharge. Samples will be collected within the first 30 minutes. If this cannot be accomplished then it needs to be documented. Monitoring results are to be recorded on a discharge monitoring report (DMR) and submitted to ADEQ by September 30th of each year ([these reports will be submitted to the Water Quality Group who will intern submit them as a packet to ADEQ along with the annual report](#)). For each outfall location identified in the facilities SWPPP 4 visual examinations will be made (two between June 1st and October 31st and two between November 1st and May 31st). Inactive and unstaffed sites can include a waiver in their SWPPP stating that monitoring is not feasible ([at this time the only industrial sites that would qualify are the material sites](#)).

Section 8.6 identifies the specific assessment levels for each group of industrial facilities. Out of the groups of industrial facilities, only the Durango Sign Shop and the Material Sources require monitoring.

Maintenance Yards are **not** classified as industrial facilities, however 4 require monitoring: Bisbee Storage Yard, Nogales Maintenance Yard, and the Superior Storage and Fuel Yards. Only two samples are needed at these yards (one between June 1st and October 31st and one between November 1st and May 31st). TDS, TSS, TPH, and additional parameters will be monitored ([Bisbee Storage Yard \[Copper, zinc, pH \(low\), cadmium\], Nogales Maintenance Yard \[Chlorine, *Escherichia coli*, ammonia, and copper\], and the Superior Storage and Fuel Yards \[copper\]](#)).

For the first 12 months of the permit term, we will continue our current monitoring plan (occurs just in Phoenix and Tucson and is conducted by a consultant). Within 12 months a new Phoenix location will be selected and 3 additional locations will be selected ([probably one discharging to Oak Creek, one discharging to Nogales Wash, and another to be determined](#)). One complete sample (see Table 8.7.2) is to be collected at each outfall during each wet season (summer: June 1st to October 31st; winter: November 1st to May 31st). For the outfall that discharges into an impaired water, the pollutant of concern will be added to the list of parameters.

Pollutant loading for each year of MS4 monitoring will be estimated for BOB, COD, TSS, TDS, total nitrogen, total ammonia plus organic nitrogen (TKN), total phosphorous, and for detected metals.

Update within 12 months of permit issuance:

Stormwater Guidance Manual for Industrial Activities

Stormwater Guidance Manual for MS4 Activities

Section 9.0 Reporting and Recordkeeping Requirements

Annual Reports are due to ADEQ by September 30th of each year and will cover July 1st to June 30th of each year. Table 9.1.3 shows a list of annual report requirements. [This report will be coordinated by the Office of Environmental Services and the Water Quality Group.](#)

Section 10.0 Penalties for Violations of Permit Conditions

This section addresses what potential penalties can be assessed if ADOT does not comply with the permit.

Section 11.0 Standard Conditions

The section is standard to every AZPDES/NPDES permit. Signatory requirements are explained in Section 11.3. All reports and the SSWMP are to be signed by the director or by an authorized representative (e.g., District Engineer or Director of Environmental Services).

If a deficiency is noted in the SSWMP by ADEQ, then ADOT will make the required changes within 30 calendar day of notification. ADOT will include in the SSWMP existing agreements with federal, state, or local agencies that would affect the provisions or implementation of the SSWMP or SWPPPs.

Reports of compliance or non-compliance with, or any progress on compliance schedules of this permit are due to ADEQ no later than 14 days following each schedule date.

How to access the permit:

1. Go to: <http://www.azdot.gov/Highways/OES/Index.asp>
2. In the lower right hand corner of the page that comes up – select OES FTP Site; a separate window will pop up asking for User Name and Password
3. User Name: oes
4. Password: Oes_2008
5. Select Water Quality Folder
6. Select Final Stormwater Permit_081808

Summary of ADOT's Individual Statewide Stormwater Permit Requirements for Stormwater Discharges from Construction Activities

Section 5 of the permit describes the measures that are to be implemented for construction activities owned, operated, or contracted by ADOT. Permit conditions are extremely similar to those contained in the CGP (in many cases, the general requirements are the same, but the ADOT permit includes additional detail regarding those requirements). Construction includes all areas used **exclusively** (defined as those activities that are intended to serve ADOT only) for ADOT construction projects including: staging areas, borrow areas, storage areas and yards, access roads, and any mobile operations (batch plants).

- ADOT's Statewide Stormwater Permit is effective September 19, 2008.
- ADOT contractors must comply with ADOT's permit AND must submit a Notice of Intent (NOI) for coverage under the AZPDES Construction General Permit (AZCGP). The contractor **does not** need to file a NOI for coverage under ADOT's permit.
- The contractor's NOI for coverage under the AZCGP must reference the site as an ADOT project.
- No permit waivers are considered/allowed by ADOT for any projects that disturb one acre or more.
- Monitoring is required for any support activity (asphalt and concrete batch plants; borrow areas, staging and storage areas) within ¼ mile of a unique or impaired water. Asphaltic wastes and process wastewater must be removed from the site and disposed of properly.
- ADOT's permit requires that the site map includes approximate slopes anticipated after major grading activities. The permit includes specific detail requirements for inclusion of support activity (including asphalt and batch plants) locations.
- ADOT's permit prohibits the installation of temporary sediment or erosion control BMPs below the ordinary high water level of any waterbody unless absolutely necessary.
- Non-stormwater discharges not specified in Section 1.3 of ADOT's permit are not allowed.
- Inspections shall be done by a trained and certified Erosion Control Coordinator (ECC).
- ADOT's permit allows a reduced inspection frequency if the construction site is in an area of the state that receives less than 20 inches of average annual rainfall and construction is occurring during the dry season (this was removed from the 2008 CGP).
- The reduced inspection frequency includes inspections once a month, anytime 30% chance of rain is predicted (percent chance of rain is only identified in ADOT's permit, not in the CGP), and within 24 hours of the end of each rain event of 0.5 in or greater. If rain is forecast for several consecutive days, ADOT may reduce the inspection frequency to: before the first forecast storm event and every 48 hours thereafter until a storm event occurs or the chance of rain decreases to below 30%.
- ADOT's permit includes additional requirements for inspection of asphalt facilities and concrete batch plants.

- ADOT is required to implement tracking and follow-up procedures to ensure that appropriate action is taken in response to issues noted during inspections.
- ADOT's permit outlines additional details for good housekeeping requirements (including those for storage of cement and fly ash and the availability of spill kits).
- Some timeframes required by the permit (for repair of BMPs and updating of the SWPPP, for example) are more stringent than the AZCGP, but have already been required by ADOT through specifications.
- The SWPPP must identify who will have the responsibility for long term operation and maintenance of permanent stormwater management BMPs.
- ADOT's permit emphasizes that post-construction measures installed during construction must be inspected to ensure that sediment is not reaching the infiltration area and that these areas (intended to infiltrate or percolate) are protected from compaction.
- Inspection and associated records are to be kept for at least 5 years from the expiration of this permit (up from 3 years from filing of NOT).
- ADOT contractors will comply with the CGP for regulated construction projects, including the contractor's requirement to file a NOI and NOT. ADOT may also impose project requirements in addition to those specified in the CGP (this will be through ADOT specifications).
- When contractors complete their work at a site and interim stabilization is in place, they may file a NOT to terminate their responsibility for site activities (after the Resident Engineer or District has given the okay) and ADOT will assume responsibility until final stabilization. This is different from the requirement in the AZCGP to remove all temporary stabilization prior to filing the NOT.
- Where it states that removal of temporary BMPs is necessary prior to the filing of the NOT, this provision does not require removal of BMPs such as straw wattles that are permanently incorporated into final stabilization provided they are specified as part of the site's final stabilization plan and are properly maintained.

How to access the permit:

1. Go to: <http://www.azdot.gov/Highways/OES/Index.asp>
2. In the lower right hand corner of the page that comes up – select OES FTP Site; a separate window will pop up asking for User Name and Password
3. User Name: oes
4. Password: Oes_2008
5. Select Water Quality Folder
6. Select Final Stormwater Permit_081808

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External Review Subcommittee

Doug Forstie, Co-Leader
LeRoy Brady, Co-Leader
Ken Davis-FHWA
Amanda McGinnis-Associate General Contractors
Phil Rice-Fann Contracting
Terry Brennan-Tonto National Forest

Stormwater Advisory Team (SWAT) Members

- **Erosion Control Specifications**-Leader, Joe Roman, Contracts and Specifications. Status: Dormant, Final specification approved by FHWA 10/05, implemented 12/05, AGC wants to re-visit in 2007.
- **Construction Checklists (Performance Evaluation System)**-Leader, Ted Littlefield, Construction Operations. Status: Dormant, Checklists completed 2005, training of inspectors completed mid-2006, conformity currently at 49%, need to increase before 2007 reporting period.
- **Construction Site Interim Maintenance** (Prior to NOT release)-Leader, Julio Alvarado. Status: Active, JOC under development.

Encroachment Permits SWAT

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SWAT Leaders

On-call Consultants:

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AMEC-Ed Latimer

GEC/SA&B-Bob Bohannon

Logan Simpson Design-Wayne Colebank

Tetra Tech-John Kosko

Statewide Monitoring SWAT?

Stormwater Advisory Team (SWAT) Items to Tackle

Design SWAT

- Update Post-Construction BMP Manual
- Update SSWMP
- Training

Materials SWAT

- Develop notification process for geotech SWPPPs
- Update SSWMP
- Training

Maintenance/Facilities SWAT

- Update Maintenance and Facilities BMP Manual
- Update Monitoring Guidance Manual for Industrial Activities
- Develop maintenance schedules and priorities for storm system
- Implement BMPs at all Facilities Statewide
- Install markers on all Maintenance Yards' catch basins (new or existing)
- Update SSWMP
- Training

MS4 SWAT

- Update Monitoring Guidance Manual for MS4 Activities
- Investigate the source of dry weather flows identified in 2005 Summary Report-Dry Weather Screening
- MS4 outfall monitoring
- Updating Maintenance Yard SWPPPs
- Develop Illicit Discharge and Detection Elimination Policy
- Develop IDDE enforcement policy
- Inventory Post-construction BMPs
- Inventory outfalls
- Update SSWMP
- Training

Construction SWAT

- Update Erosion Control Specifications
- Review and update (if necessary) Erosion and Pollution Control Manual
- Update Monitoring Guidance Manual for Construction Activities
- SWPPP Template revision
- Update SSWMP
- Training

Encroachment Permits SWAT

- Illicit discharge and detection
- Update SSWMP
- Training

Information Management SWAT

Stormwater Advisory Team (SWAT) Items to Tackle

- Update website
- Establish Stormwater Library site
- Create stormwater system maps
- Update SSWMP

Public Education/Involvement SWAT

- Adopt a Highway stormwater component
- Public reporting system
- Update SSWMP

Training SWAT

- Update training modules and roll out training classes
- Update SSWMP

Statewide Monitoring SWAT (should this SWAT be reformed?)

- Update Monitoring Guidance Manual for Industrial Activities
- Update Monitoring Guidance Manual for Construction Activities
- Update Monitoring Guidance Manual for MS4 Activities